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*Counsel for Defendants*  
UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC.

Plaintiff,

Case No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC

## Defendants

**DECLARATION OF MAXWELL V.  
PRITT IN SUPPORT OF  
DEFENDANTS UBER  
TECHNOLOGIES, INC.'S AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL EXHIBITS TO THEIR  
MOTION TO COMPEL PRODUCTION  
OF DOCUMENTS**

Judge: Hon. Jacqueline Scott Corley  
Trial Date: October 10, 2017

1 I, Maxwell V. Pritt, declare as follows:

2       1. I am counsel at the law firm of Boies Schiller Flexner LLP representing  
 3 Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, "Uber") in this matter. I  
 4 am a member in good standing of the Bar of the State of California. I make this declaration based  
 5 upon matters within my own personal knowledge and if called as a witness, I could and would  
 6 competently testify to the matters set forth herein. I make this declaration in support of Uber's  
 7 Administrative Motion to File Under Seal Exhibits to Their Motion to Compel Production of  
 8 Documents.

9       2. I have reviewed the following exhibits and only the portions identified below merit  
 10 sealing:

<b>Document</b>	<b>Portions to Be Filed Under Seal</b>	<b>Designating Party</b>
Letter Brief to Compel the Production of Documents	Highlighted Portions	Plaintiff
Pritt Declaration ISO Letter Brief to Compel Production of Documents ("Pritt Declaration")	Highlighted Portions	Plaintiff
Exhibit 3 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 4 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 5 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 6 to the Pritt Declaration	Entire Document	Plaintiff

20       3. The highlighted portions of the Letter Brief and the Pritt Declaration, and the  
 21 entirety of Exhibits 3, 4, 5 and 6 to the Pritt Declaration, contain information that I understand  
 22 Waymo designated or considers to be "Highly Confidential – Attorneys' Eyes Only" under the  
 23 Protective Order. Waymo's counsel asked me to file search terms, custodians, and hit counts  
 24 under seal.

25       4. Uber's request to seal is narrowly tailored to the information Waymo asked to be  
 26 sealed.

27       I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd  
 28 day of August, 2017 at Oakland, California.

1  
2 Dated: August 3, 2017

BOIES SCHILLER FLEXNER LLP

3 By: /s/ Maxwell V. Pritt  
4 Maxwell V. Pritt

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7 **ATTESTATION OF E-FILED SIGNATURE**

8 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this  
9 document. In compliance with General Order 45, X.B., I hereby attest that Maxwell V. Pritt has  
10 concurred in this filing.

11 Dated: August 3, 2017

12 /s/ Karen L Dunn  
13 Karen L. Dunn

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